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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

A.H., a minor, individually and as successor in interest to decedent, Richard Hayes, by and through his Guardian ad Litem, Tiffany Hayes; S.H., a minor, individually and as successor in interest to decedent, Richard Hayes, by and through her Guardian ad Litem, Tiffany Hayes; and TIFFANY HAYES, individually,) Case No.: 2:22-CV-03671 WLH (ASx)
Plaintiffs,)
vs.)
COUNTY OF LOS ANGELES, and DOES 1 to 10, inclusive,)
Defendants.)

**JOINT STATUS REPORT RE
SETTLEMENT**

COME NOW Plaintiffs Tiffany Hayes, A.H., and S.H., and Defendants
County of Los Angeles, and Deputies Carlos De La Torre, Alex Valdivia and Janet
Huoth and, pursuant to the Court's order dated January 10, 2025 (Dkt. 99), hereby
submit the following joint status report regarding their mediation.

1. On June 21, 2023, the parties participated in mediation with mediator
Rick Copeland. At the conclusion of the mediation, Mr. Copeland made a
mediator's proposal, which the parties accepted. The settlement was subsequently

1 approved by the relevant Los Angeles County boards, including the Contract Cities
2 Liability Trust Fund and Board of Supervisors.

3 2. The plaintiffs filed a petition to approve the compromise of the minor
4 plaintiff, which was approved by the Court on February 18, 2025 (Dkt. 101).
5 Pursuant to the Court's order, settlement funds shall be delivered to plaintiffs
6 within 45 days from the date of the order, i.e. on or before April 4, 2025.

7 3. Settlement funds have been requested, and the parties anticipate filing
8 a stipulation to dismiss on or before April 4, 2025.

9
10 DATED: February 25, 2025

LAW OFFICES OF DALE K. GALIPO

11 /s/ Renee V. Masongsong

12 By: _____

Dale K. Galipo

13 Renee V. Masongsong

14 Attorneys for Plaintiffs

15
16 DATED: February 25, 2025

CARPENTER, ROTHANS & DUMONT LLP

17 /s/ Jill Williams

18 By: _____

Jill Williams

19 Kimberly Sarmiento

20 Attorneys for Defendants

21 Local Rule 5-4.3.4

22 All other signatories listed, and on whose behalf the filing is submitted,
23 concur in the filing's content and have authorized the filing.
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